



NORTH CAROLINA DEPARTMENT OF  
ENVIRONMENT AND NATURAL RESOURCES

DIVISION OF WASTE MANAGEMENT

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SECRETARY

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DIRECTOR

August 9, 2000

Mr. E. B. Grant, Jr. P.E.  
The Plumblin Corporation P.A.  
Engineering and Land Surveying  
121 Washington Avenue  
Weldon, NC 27890

Subj.: Coal Ash Structural Fill at the Wommack and Sons Property Saw Mill  
Lumber Drying Yard.

Dear Mr Grant:

As you know, the subject structural fill construction was interrupted by hurricane Floyd last fall and in fact you have indicated that the site experienced flooding. Did any of the ash leave the site during this flooding? According to a note in our files, this occurred when the initial project was approximately 80% complete. Subsequently, you submitted a notification for a **revision** to the initial project. This specifies changing the slope of the sides on this drying area from (4 to 1) to (3 to 1) (horizontal to vertical) and states that an additional eleven feet of ash is to be added on top of the fill already in place.

We are finding that attempts to summarize projects without closure statements and recordation documentation at each stage or phase of construction end up with incomplete and inaccurate summaries. When you and I were talking last week, you mentioned that you were going to issue notification about still another stage in this project. The purpose of this letter is to alert you to the problem we are having with such phased projects. We are asking that you change the notification paper work on these three separate phases into what is essentially a combined, single project. We will then trash the paper work that has been generated up to this time in this file and anticipate one closure statement and one recordation event which includes all of the combined ash utilized in all of the fill activit(ies) at the site .

You will need to rewrite the narrative(s), perhaps rename and renumber some drawings, perhaps creating additional narrative(s) in order to describe the project construction accurately including in some cases the quantities of ash actually used in some of the fill phases. A good example of the problem in this drying yard project is the initial notification. This will not be completed. Instead, the forementioned "Revision" will place additional ash (eleven feet) on top of a



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E. B. Grant  
August 9, 2000  
Page 2

partially finished initial fill. Questions arise as to how much ash is being applied on the property, where on the property, how much fly ash, how much bottom ash, what is the projected completion date, etc.? How much TOTAL ash is to be (or has been) applied. The goal is to provide accurate ash usage history which will then allow making the closure statement and the deed recordation accurate.

Rule .1703(a)(1) specifies that the name of the U.S. Geological Survey seven and one-half minute map where the project is located be given or an eight and one-half inch topographic map showing the project location {be supplied}. This requirement has not been met in the material received to date and this needs to be accomplished. Additionally, these projects (initial and revision) already span three years of time. Rule .1703(a)(4) specifies that a TCLP analysis shall be conducted at least annually. This is normally being routinely done by the generator and the data should be available from him. Although the rule does not specifically state that this update data be submitted to the DSW, please submit it once you have obtained it.

Please telephone me at 919-733-0692, extension 260 if you have questions about the contents of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "William R. Hocutt", with a stylized flourish at the end.

William R. Hocutt, Chemist  
Solid Waste Section

cc: Jim Coffey  
Jim Barber

c:wp6doc/letter/Halifax-DryLmbr-Fill-08-00